

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law

100 Lafayette Street, Suite 501
New York, NY 10013

Franklin A. Rothman
Jeremy Schneider
Robert A. Soloway
David Stern
Rachel Perillo

Tel: (212) 571-5500
Fax: (212) 571-5507

November 1, 2024

BY ECF

Hon. Katherine Polk Failla
United States Courthouse
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: United States v. Nadine Wade, 21 Cr. 472 (KPF)

Dear Judge Failla:

The defense sentence submission in the referenced matter is due November 7, and the sentencing hearing November 21. Without objection of the government, I write seeking a brief extension. Since early September, we have been working to obtain pertinent records from the Administration for Children's Services which are central to our client's presentation. Following our initial correspondence containing Ms. Wade's duly executed release, we were informed that the agency required 45 days to comply with the request. As of today, our follow-up communications seeking the status and prompt delivery of the records have met with no clarity as to the date the records will go out. Annexed for the court's reference is a record of communications between my office and ACS.

For this reason, it is respectfully requested that the date for the defense submission be extended to Monday, December 2, the government submission to December 9, and the sentencing hearing to December 16, 2024, or a date thereafter convenient to the Court. Should we not have the ACS files in hand on or before Wednesday, November 6, we will seek a so-ordered subpoena from your Honor directing forthwith delivery of the files.

Thank you very much for your attention to this matter.

Respectfully,

Robert A. Soloway

Robert A. Soloway

RAS:sc

Application GRANTED. Ms. Wade's sentencing, currently scheduled for November 21, 2024, is hereby ADJOURNED to **December 19, 2024**, at **3:00 p.m.**

Accordingly, Ms. Wade shall file her sentencing submission on or before **December 5, 2024**, and the Government shall file its submission on or before **December 12, 2024**.

The Clerk of Court is directed to terminate the pending motion at docket entry 336.

Dated: November 6, 2024 SO ORDERED.
New York, New York

Katherine Peltz Failes

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE